

4. As indicated in the Certificate of Conference below, Plaintiffs do not oppose the relief requested by this motion.

5. This extension is sought for good cause. Counsel for Defendant STA is continuing to work with Counsel for Plaintiffs to resolve the issues presented by Plaintiffs' motion to compel. Counsel for Defendant STA anticipates that a resolution of Plaintiffs' motion to compel will be reached within the additional time sought by this unopposed request for extension. Defendant STA produced certain documents requested by Plaintiffs. Counsel for Defendant STA and Counsel for Plaintiffs are now discussing the scope and the logistics of a potential deposition related to Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition. Counsel for Defendant STA believes that additional time will likely facilitate resolution of the issues presented by Plaintiffs' motion without the necessity of court intervention.

6. Accordingly, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), STA respectfully requests that this Court extend the deadline for STA to file its response to Plaintiffs' Motion to Compel STA to Comply with Topic 12 of Plaintiffs' Amended Notice of F.R.C.P. Rule 30(b)(6) Deposition until June 4, 2014.

Date: May 28, 2014

Respectfully submitted,

/s/ John Volney

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AMERICA, LLC**

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Plaintiffs' counsel regarding the matters at issue in this motion. During that conference, counsel indicated that Plaintiffs are not opposed to the relief sought herein.

Certified to on May 28, 2014, by

/s/Alan Dabdoub

Alan Dabdoub

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on May 28, 2014.

/s/ John Volney

John Volney